

The Tolerable Standard

Recommendations 1-7

The CIH supports the updating of the Tolerable Standard, believing that the current Standard is woefully out-of-date and does little to tackle the continuing poor conditions found in a minority of Scottish homes. The Institute believes that **detailed guidance** on the revised Standard is required and supports the proposed interpretation of **rising and penetrating dampness, wholesome water and condensation and mould growth**.

The CIH supports the inclusion of **thermal insulation** however is concerned that the wording does not go far enough. Instead of 'basic' the Institute would like to see this changed to 'adequate' or 'sufficient' thermal insulation supported by detailed and stringent guidance.

However, the Institute does not accept the Task Force's decision to exclude **serious disrepair** from the updated Standard. While the Institute accepts that some of the elements of serious disrepair are picked up by specific failures contained within the Standard, for example structural instability, others are not. The Institute also does not accept that there would be any definitional problems brought about by the inclusion of serious disrepair. Indeed the Task Force goes on to define serious repair as part of the proposed Scottish Housing Quality Standard. The Institute therefore believes that serious disrepair should be included in the updated Tolerable Standard and not in the new Housing Quality Standard.

Scottish Housing Quality Standard

Recommendations 8

The CIH welcomes the introduction of a cross-tenure Quality Standard. However the Institute believes there may be merit in extending the Standard so that individual properties in the **private sector could pass or fail**. If such information was made available within Sellers Packs it will encourage owners to keep their property in a good state of repair in order to add value to and increase the saleability of their property.

Recommendation 9-10

The CIH is broadly supportive of the proposed elements however would reiterate its call for the inclusion of serious disrepair in an updated Tolerable Standard. Further detailed work is obviously required on all aspects of the Standard as well as on the supporting guidance and the Institute is keen to play a pro-active role in future consultation on this issue.

The Institute does not believe that a house should pass/fail the Quality Standard due to problems in elements outwith the owner's control and therefore environmental elements should be excluded from the Standard.

However common parts within a tenement should be included as this will also encourage owners to take responsibility for the repair of such areas. The Institute seeks further clarification as to how the Standard relates to the common property and suggests that it includes all items listed as scheme property in the draft Tenements (Scotland) Bill .

Recommendation 11

The CIH does not believe that it would be feasible to include **accessibility** in the Housing Quality Standard however there is a profound need for greater information into the suitability of the housing stock. Therefore while no property should pass or fail a quality standard on the basis of accessibility, the introduction of such a standard is an opportunity to collate data on this subject.

Recommendation 12

The CIH believes that further consideration should be given to the inclusion of **noise insulation**. While there are a number of difficulties associated with the objective measurement of noise nuisance, many households do suffer from noise disturbance. It may be the case that the Housing Quality Standard is not the correct method to tackle this problem, however the Institute would urge the Executive to examine the issue in detail to determine what steps can be taken to alleviate noise nuisance.